



# **Privacy Impact Assessment (PIA)**

**COC Election Systems  
(COC-ES)**

**Revision: 1.05**



**Farm Service Agency**

**Date: *July 31, 2009***



## Document Information

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Document Revision and History			
Revision	Date	Author	Comments
10.1	07/06/2009	D. Brizendine ISO	Initial Version
1.02	July 7, 2009	D. Brizendine ISO	Populated Sections 3,4,5
1.03	July 8, 2009	J. Finke – ECS	Review & minor updates
1.04	July 31, 2009	John Blankenship - PARMO	Review & minor updates
1.05	July 31, 2009	D.Brizendine	Updated responses for 24, 25, 26, 26.1; Document review; template updates



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# 1 Purpose of Document

USDA DM 3515-002 states: “Agencies are responsible for initiating the PIA in the early stages of the development of a system and to ensure that the PIA is completed as part of the required System Life Cycle (SLC) reviews. Systems include data from applications housed on mainframes, personal computers, and applications developed for the Web and agency databases. Privacy must be considered when requirements are being analyzed and decisions are being made about data usage and system design. This applies to all of the development methodologies and system life cycles used in USDA.

Both the system owners and system developers must work together to complete the PIA. System owners must address what data are used, how the data are used, and who will use the data. System owners also need to address the privacy implications that result from the use of new technologies (e.g., caller identification). The system developers must address whether the implementation of the owner’s requirements presents any threats to privacy.”

The Privacy Impact Assessment (PIA) document contains information on how the COC Election Systems affects the privacy of its users and the information stored within. This assessment is in accordance with NIST SP 800-37 *Guide for the Security Certification and Accreditation of Federal Information Systems*.



## 2 System Information

System Information	
Agency:	Farm Service Agency
System Name:	COC Election Systems
System Type:	<input checked="" type="checkbox"/> Major Application <input type="checkbox"/> General Support System <input type="checkbox"/> Non-major Application
System Categorization (per FIPS 199):	<input type="checkbox"/> High <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> Low
Description of System:	<p>The County Office Committee (COC) Elections system automates FSA-681 reporting by County Offices to expedite the process for electing committee members (eligible producers) for the county offices. These County Committees, of three to five members, are major decision makers and an authority on county programs, and decisions. The committee's functions are very important to FSA's mission and have specific regulations defined in the farm bills from Congress. The COC Elections System supports the elections process by the following functions:</p> <p>Collection of the nominee and organization information</p> <p>Selection of all the producers that are eligible to vote (based on information such as committee and local administrative area (LAA) codes in the name and address file)</p> <p>Build and send county-specific list of all producers eligible to vote (for printing onto ballot self-mailer forms, FSA-681)</p> <p>Collection of election data from returned ballot forms (the County Election and Media Outreach Report)</p> <p>Creation of COC Directory showing all members and information related to their terms.</p>
Who owns this system? (Name, agency, contact information)	Rebecka Gaskill, Business Branch/Group/Office Chief (816)926-1645 <a href="mailto:Rebecka.Gaskill@kcc.usda.gov">Rebecka.Gaskill@kcc.usda.gov</a>



# Privacy Impact Assessment for COC Election Systems (COC ES)



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### 3 Data Information

#### 3.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	Customer and Employee data: COC election identifier, ballot detail identifier, voting location identifier, elector identifier, ballot disqualified reason identifier, race identifier, COC member identifier, COC member position, COC election candidate, COC position, local administration area, and detail data to support these. Other: SCIMS Producer data
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 3.
2.1	State the law or regulation that requires the collection of this information.	7 U.S.C. 135b, 450j, 450k, 405l, 1281-1393, 1421-1449, 1461-1469, 1471-1471i, 1781-1787; 15 U.S.C. 714-714p; 16 U.S.C. 590a-590q, 1301-1311, 1501-1510, 1606, 2101-2111, 2201-2205, 3501, 3801-3847, 4601, 5822; 26 U.S.C. 6109; 40 U.S.C. App. 1, 2, 203; 43 U.S.C. 1592; and 48 U.S.C. 1469
3	Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4	Sources of the data in the system.	FSA, The original data was migrated from FSA's legacy IBM System 36 files and now keep up to date by input from authorized USDA Service Center employees
4.1	What data is being collected from the customer?	Personal data that resides in SCIMS and the COC Election database.
4.2	What USDA agencies are providing data for use in the system?	Master Reference Tables (MRT), COC Elections Data Base, SCIMS Producer data, Nominee and Producer Mailing Lists
4.3	What state and local agencies are providing data for use in the system?	FSA



No.	Question	Response
4.4	From what other third party sources is data being collected?	None
5	Will data be collected from sources outside your agency? For example, customers, USDA sources (i.e., NFC, RD, etc.) or Non-USDA sources.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 6.
5.1	How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?	N/A
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	N/A
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	N/A

### 3.2 Data Use

No.	Question	Response
6	Individuals must be informed in writing of the principal purpose of the information being collected from them. What is the principal purpose of the data being collected?	N/A
7	Will the data be used for any other purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 8.
7.1	What are the other purposes?	N/A
8	Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
9	Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected (i.e., aggregating farm loans by zip codes in which only one farm exists.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 10.
9.1	Will the new data be placed in the individual's record (customer or employee)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No





No.	Question	Response
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
9.3	How will the new data be verified for relevance and accuracy?	Authorized users will verify the data.
10	Individuals must be informed in writing of the routine uses of the information being collected from them. What are the intended routine uses of the data being collected?	Create and Mail Election Ballots
11	Will the data be used for any other uses (routine or otherwise)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 12.
11.1	What are the other uses?	N/A
12	Automation of systems can lead to the consolidation of data – bringing data from multiple sources into one central location/system – and consolidation of administrative controls. When administrative controls are consolidated, they should be evaluated so that all necessary privacy controls remain in place to the degree necessary to continue to control access to and use of the data. Is data being consolidated?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 13.
12.1	What controls are in place to protect the data and prevent unauthorized access?	N/A
13	Are processes being consolidated?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 14.
13.1	What controls are in place to protect the data and prevent unauthorized access?	N/A

### 3.3 Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 15. Indefinite retention.
14.1	How long is the data retained whether it is on paper, electronic, in the system or in a backup?	N/A



No.	Question	Response
14.2	What are the procedures for purging the data at the end of the retention period?	N/A
14.3	Where are these procedures documented?	N/A
15	While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?	Software and data are updated as necessary according to procedure and USDA Service Center employees' reviews will check accuracy.
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

### 3.4 Data Sharing

No.	Question	Response
17	Will other agencies share data or have access to data in this system (i.e., international, federal, state, local, other, etc.)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 18.
17.1	How will the data be used by the other agency?	N/A
17.2	Who is responsible for assuring the other agency properly uses the data?	N/A
18	Is the data transmitted to another agency or an independent site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 19.
18.1	Is there appropriate agreement in place to document the interconnection and ensure the PII and/or Privacy Act data is appropriately protected?	
19	Is the system operated in more than one site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 20.
19.1	How will consistent use of the system and data be maintained in all sites?	Administrative controls and procedures are established to maintain consistent system use.



### 3.5 Data Access

No.	Question	Response
20	Who will have access to the data in the system (i.e., users, managers, system administrators, developers, etc.)?	Only authorized users who have been certified.
21	How will user access to the data be determined?	User names and passwords are initially assigned by authorized technicians.
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No User names and passwords are initially assigned by authorized technicians.
22	How will user access to the data be restricted?	Users have access to only the data related to their area of responsibility based on the security office certification. User Access is controlled by E-Auth and EAS
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
23	Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Firewalls in software and established security rules.

### 3.6 Customer Protection

No.	Question	Response
24	Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface (i.e., office, person, departmental position, etc.)?	USDA Privacy Office
25	How can customers and employees contact the office or person responsible for protecting their privacy rights?	By contacting John Underwood, Privacy Officer, at <a href="mailto:john.underwood@kcc.usda.gov">john.underwood@kcc.usda.gov</a> & 816.926.6992
26	A "breach" refers to a situation where data and/or information assets are unduly exposed. Is a breach notification policy in place for this system?	<input checked="" type="checkbox"/> Yes – If YES, go to question 27. Common FSA incident reporting process. <input type="checkbox"/> No



No.	Question	Response
26.1	If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date.	
27	Consider the following: Consolidation and linkage of files and systems Derivation of data Accelerated information processing and decision making Use of new technologies Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 28.
27.1	Explain how this will be mitigated?	N/A
28	How will the system and its use ensure equitable treatment of customers?	Respective USDA County Office Service Center managers, State Office managers and the Headquarter Office managers are held accountable.
29	Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 30
29.1	Explain	N/A

## 4 System of Record

No.	Question	Response
30	Can the data be retrieved by a personal identifier? In other words, does the system actually retrieve data by the name of an individual or by some other unique number, symbol, or identifying attribute of the individual?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 31
30.1	How will the data be retrieved? In other words, what is the identifying attribute (i.e., employee number, social security number, etc.)?	N/A
30.2	Under which Systems of Record (SOR) notice does the system operate? Provide number, name and publication date. (SORs can be viewed at <a href="http://www.access.GPO.gov">www.access.GPO.gov</a> .)	N/A
30.3	If the system is being modified, will the SOR require amendment or revision?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

## 5 Technology

No.	Question	Response
31	Is the system using technologies in ways not previously employed by the agency (e.g., Caller-ID)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, the questionnaire is complete.
31.1	How does the use of this technology affect customer privacy?	N/A



## 6 Completion Instructions

Upon completion of this Privacy Impact Assessment for this system, the answer to OMB A-11, Planning, Budgeting, Acquisition and Management of Capital Assets, Part 7, Section E, Question 8c is:

1. Yes.

PLEASE SUBMIT A COPY TO THE OFFICE OF THE ASSOCIATE CHIEF INFORMATION OFFICE FOR CYBER SECURITY.